

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-310-JRG

JURY TRIAL DEMANDED

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF COMMSCOPE'S
OPPOSITION TO PLAINTIFF TQ DELTA'S MOTION TO STRIKE THE INVALIDITY
REPORT OF MARK LANNING (Dkt. 338)**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the Deposition Transcript of Mark R. Lanning, dated December 2, 2022.

3. Attached hereto as **Exhibit G** is a true and correct copy of excerpts from the Appendix B to Opening Expert Report of Mark R. Lanning, dated August 29, 2022.

4. Attached hereto as **Exhibit H** is a true and correct copy of excerpts from CommScope's Preliminary Invalidity Contentions.

5. Attached hereto as **Exhibit I** is a true and correct copy of Exhibit F10-354D Invalidity of U.S. Patent based on Peeters served with Nokia Defendants' Initial Invalidity Contentions.

6. Attached hereto as **Exhibit J** is a true and correct copy of Exhibit F-04 to Defendants' Invalidity Contentions: Comparison of U.S. Patent No. 9,154,354 and Cai, served with CommScope's Preliminary Invalidity Contentions.

7. Attached hereto as **Exhibit K** is a true and correct copy of excerpts from the Expert Rebuttal Report of Arthur Brody, Ph.D., Regarding Validity of the Family 10 Patent.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2023, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong